

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792-0048 • E: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

July 1, 2024

**VIA ECF**

The Hon. Andrew L. Carter, Jr., U.S.D.J.  
U.S. District Court, Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Lopez v. Fluxpace Design & Build LLC et al*  
**Case No.: 22-cv-07605**

Dear Honorable Judge Carter:

This law firm represents Plaintiff Juan Lopez (the "Plaintiff") in the above-referenced matter.

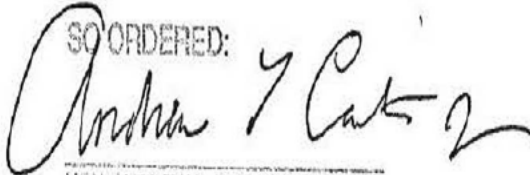
Pursuant to Your Honor's Individual Motion Practice Rules, this letter respectfully serves to request an extension of time to comply with Your Honor's June 14, 2024 Order [Dckt. No. 26] (the "June 14<sup>th</sup> Order") from July 1, 2024 to, through and including, July 26, 2024.

This is the first request of its kind. If granted, this request would not affect any other Court-scheduled deadlines.

The basis of this request is that the undersigned has been attempting to schedule a meet-and-conferral with counsel for Defendants Fluxpace Design & Build LLC, Fluxpace Inc., and Victor Sierra (collectively, the "Defendants"), to obtain a stipulation of service, pursuant to the directives of the June 14<sup>th</sup> Order.

Counsel for Defendants has not responded to the undersigned's emails, telephone calls, or meet-and-conferral attempts.

In light of the foregoing, it is respectfully requested that the Court extend Plaintiff's time to comply with Your Honor's June 14<sup>th</sup> Order from July 1, 2024 to, through and including, July 26, 2024, to allow Plaintiff additional time to perfect service on the Defendants, and proceed with the filing of an application for a Clerk's Certificate of Default Judgment.

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
Dated: July 3, 2024

LEVIN-EPSTEIN &amp; ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
Jason Mizrahi  
60 East 42<sup>nd</sup> Street, Suite 4747  
New York, NY 10170  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Plaintiff*